

EXHIBIT 31

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DREW J. RIBAR, Pro Se Plaintiff

3480 Pershing Ln

Washoe Valley, NV 89704

(775) 223-7899

Const2Audit@gmail.com

vs.

WASHOE COUNTY, et al.

Defendants.

Case No.: 3:24-cv-00526-ART-CLB

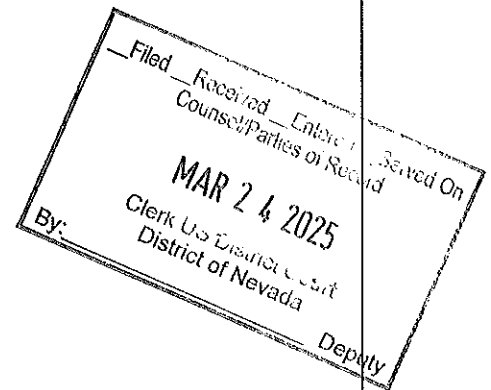


EXHIBIT 31

Title: Video Recording of August 21, 2024, Library Board of Trustees (LBOT) Meeting –
Suspension Hearing

Date of Recording: August 21, 2024

Source: Video Recording from the Library Board of Trustees Meeting

Bates Number Range: Video 5

Description:

PLEADING TITLE - I

1 This exhibit contains a **video recording of the August 21, 2024, Washoe County Library**
2 **Board of Trustees (LBOT) meeting**, where **Plaintiff's suspension appeal was heard and**
3 **denied**. The video evidence **directly contradicts the official meeting minutes (See Exhibit 24**
4 **- Transcript)** and reveals **due process violations, selective enforcement, and retaliation**
5 **against Plaintiff for protected speech.**
6

7 8 9 **Key Evidence from the Video:**

10 11 12 **1. False Prior Restriction Claim by Jeff Scott**

- 13 ○ Library Director **Jeff Scott** **falsely stated that Plaintiff had prior restrictions,**
14 **which were used to uphold the suspension.**
- 15 ○ **Plaintiff was never notified** of any prior restriction, violating **procedural due**
16 **process under the Fourteenth Amendment.**

17 18 **2. Denial of Due Process**

- 19 ○ **Plaintiff was denied the right to cross-examine witnesses and was not allowed**
20 **to present evidence.**
- 21 ○ **Library Board members relied on false statements** from library officials to
22 **uphold the suspension, violating *Goldberg v. Kelly*, 397 U.S. 254 (1970).**

23 24 **3. Falsification of Public Records**

- 25 ○ **The official meeting minutes (Exhibit 24) falsely claim Plaintiff called for book**
26 **bans and opposed Drag Queen Story Hour, contradicting the video evidence.**

- This constitutes a violation of NRS 241.035, which mandates accurate public meeting minutes.

4. Selective Policy Enforcement & Equal Protection Violation

- Other individuals were granted access, while Plaintiff was singled out for enforcement, demonstrating discriminatory policy application.
- This violates the Equal Protection Clause of the Fourteenth Amendment and Nevada Constitution Art.1 Sec.24

5. First Amendment Retaliation

- Plaintiff's suspension was upheld based on false claims, clearly showing that it was a retaliatory act to suppress criticism of library policies.

6. Potential Fourth Amendment Violation

- If Plaintiff was physically restricted from leaving, this may constitute an unlawful seizure under Terry v. Ohio, 392 U.S. 1 (1968).

Video File Filing Note:

- The video file is submitted separately in compliance with Northern District of Nevada electronic filing procedures.

Relevance to the Case:

- ☒ Supports **Fourteenth Amendment Due Process Violation**
- ☒ Supports **First Amendment Retaliation Claim**
- ☒ Supports **Equal Protection Violation Claim**
- ☒ Supports **Monell Liability Against Washoe County**
- ☒ Refutes **BOC's Motion to Dismiss – Confirms Washoe County Library officials acted jointly with BOC to enforce unconstitutional restrictions**

CERTIFICATION & SUBMISSION

I certify that this exhibit is a true and accurate representation of events recorded on August 21, 2024.

Dated: **March 17, 2025**

/S/Drew J. Ribar

Prepared by:
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Dated: March 17, 2025